

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CV-21376-KING/REID

UNITED STATES OF AMERICA,

Plaintiff,

v.

CEREBRAL, INC. et al.,

Defendants.

**DECLARATION OF SHANE ANTHONY GRANNUM IN SUPPORT OF THE
JOINT MOTION TO DISMISS THE AMENDED COMPLAINT**

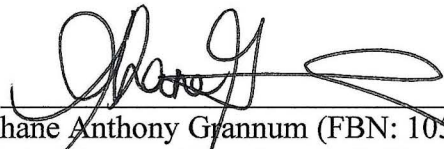
Shane Anthony Grannum, hereby declares pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney at the law firm Quinn Emanuel Urquhart & Sullivan, LLP in Miami, Florida and I serve as counsel for Defendant Kyle Robertson in the above-captioned action.
2. I am an attorney admitted to The Florida Bar (FBN: 1055050) and the Bar of the U.S. District Court for the Southern District of Florida.
3. I submit this Declaration in support of the Joint Motion to Dismiss the Amended Complaint filed by Defendants Kyle Robertson, Alex Martelli, German Echeverry, Zealthy, Inc., Gronk, Inc., and Bruno Health, P.A.
4. Attached to this Declaration are, to the best of my knowledge, information, and belief, true and correct copies of the following exhibits to the Joint Motion to Dismiss the Amended Complaint:

EXHIBIT	DOCUMENT
A	Cerebral's March 2023 Notice of HIPAA Privacy Breach
B	Zealthy Privacy Policy, last accessed August 2, 2024
C	Zealthy Sign Up Excerpt 1, last accessed August 5, 2024
D	Zealthy Terms of Use, last accessed August 5, 2024
E	Zealthy Sign Up Excerpt 2, last accessed August 5, 2024
F	Gronk Incorporation & Name Change Documents, filed February 10, 2023 and December 18, 2023
G	Gronk Dissolution Documents, filed March 25, 2024
H	Katie Jennings, <i>Getting A Refund From Mental Health Startup Cerebral Can Take Its Own Toll On Customers</i> , Forbes (Feb. 18, 2022)
I	Cerebral's Terms of Service, last revised August 25, 2023
J	Cerebral FAQ, last accessed August 5, 2024
K	Zealthy FAQ, last accessed August 6, 2024
L	First Am. Order, ECF No. 538, <i>F.T.C. v. Hornbeam</i> , No. 17-3094 (N.D. Ga. May 1, 2024)

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge.

Executed this 6th day of August, 2024.


Shane Anthony Granum (FBN: 1055050)
Quinn Emanuel Urquhart & Sullivan, LLP
2601 South Bayshore Drive, Suite 1550
Miami, FL 33133
Telephone: (305) 301-1423

Counsel for Defendant Kyle Robertson